

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

UNILOC USA, INC., et al,
Plaintiffs,

v.

AVAYA INC.,

NEC CORPORATION OF AMERICA,

Defendants.

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Case No. 6:15-cv-01168-JRG
LEAD CASE

Case No. 6:16-cv-00100-JRG

**JOINT MOTION TO STAY PROCEEDINGS BETWEEN PLAINTIFFS
AND DEFENDANT NEC CORPORATION OF AMERICA
PENDING FINALIZATION OF SETTLEMENT**

Plaintiffs Uniloc USA, Inc., and Uniloc Luxembourg, S.A. (together “Uniloc”), and Defendant NEC Corporation of America (“NEC”) hereby jointly file this Joint Motion to Stay Proceedings between Uniloc and NEC pending finalization of settlement.

The parties have reached an agreement in principal to settle the case between them, and are in the process of executing the final written settlement agreement. The parties wish to conclude the settlement without burdening the Court with any additional filings and without incurring unnecessary expense. The parties believe that this can be accomplished within thirty (30) days.

Accordingly, Uniloc and NEC respectfully request that the Court grant a 30-day stay of proceedings between them, including all deadlines, until Friday, February 24, 2017.

The parties submit that good cause exists for granting this agreed motion, as set forth above. This motion is not filed for purposes of delay, but so that justice may be served.

A proposed order granting this Joint Motion is attached.

Wherefore, Plaintiffs Uniloc and Defendant NEC, jointly, respectfully request that the Court enter the proposed order submitted with this Motion as set forth above, and grant the parties such other and further relief to which they are entitled.

Date: January 25, 2017

Respectfully submitted,

/s/ Kevin Gannon

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on January 25, 2017.

/s/ Kevin Gannon
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